

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONVERSE INC.,

Plaintiff,

VS.

ALON INTERNATIONAL S.A.,

Defendant.

CASE NO. 04-CV-12591 - PBS

**CONVERSE'S FURTHER ASSENTED -TO MOTION TO EXTEND DEADLINE FOR
FILING ITS RESPONSE TO ALON'S MOTION TO CONFIRM AND ITS
MEMORANDUM IN SUPPORT OF ITS MOTION TO VACATE ARBITRAL AWARD**

Plaintiff Converse hereby moves for a further three-day extension of time -- to September 11, 2006 -- to file its Memorandum in Support of Motion to Vacate and Response to Defendant's Motion to Confirm the arbitral award entered in the dispute between the parties.

This Court previously granted assented-to Motions for extensions of time which expire on September 6, 2006. The basis for those extensions was the parties' mutual desire to discuss matters relating to the litigation, including confidentiality.

Those discussions have neared a close. The parties recognize the need, however, for a maximum of three further days.

Accordingly, the parties submit the following filing and briefing schedule for the Court's approval:

- 1) On or before September 11, 2006, Converse will file its Response and Memorandum, or a notice of a Settlement of the litigation; and

- 2) In the event Converse files its Response and Memorandum, Alon will file its response thereto within thirty (30) days.

Respectfully submitted,

CONVERSE INC.

By its attorneys,

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/s/ Michael C. Gilleran
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Dated: September 6, 2006

Certification Pursuant to Local Rule 7.1(A)(2)

Counsel for Converse hereby certifies that counsel for Converse conferred with counsel for Alon and Alon assented to this motion.

Certificate of Service

I hereby certify that this document filed through the ECF system pursuant to Local Rule 5.4 will be sent electronically to all other parties.

_____/s/ Michael C. Gilleran_____